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Cost-effectiveness of residential solar PV is a moving target

To: CEC Commissioners:

Am writing in support of the requirement that solar PV systems be included in new residential construction in the 2019 Title24 code. I write for myself only, not for other building energy consultants who may or may not share my analyses.

I believe the cost-effectiveness of such systems is currently reasonable, but is a moving target, as are all construction costs. Further, the cost-effectiveness of PV systems for production home builders, custom home builders, and multifamily builders are all obviously different. The economic externalities of large scale solar "plants" vs distributed generation are very difficult to quantify, and any attempt to compare cost-effectiveness between them must be viewed with a keen eye on methodology. And of course distribution losses must also be considered. Furthermore, while the cost-effectiveness of large scale plants vs. distributed generation may be different, this is not a zero sum game. Eliminating the use of fossil fuels will require deployment of all available means as quickly as possible.

For decades, the CEC and other state energy policy-makers have taken bold steps to drive down the costs of solar PV technology and have helped create a vast new industry in California. You have helped "pick winners and losers" in the marketplace by intervening. This is an appropriate role for enlightened government. Such intervention with respect to heat pump technology is also welcome.

Thank you for your leadership.

Best regards,
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